



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

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**COPY**

Refer to: L1630200005 -- St. Clair County  
Sauget Sites (Area 1) -- Sauget  
Superfund/Compliance

**VIA OVERNIGHT EXPRESS**  
**ENFORCEMENT CONFIDENTIAL**

January 27, 1994

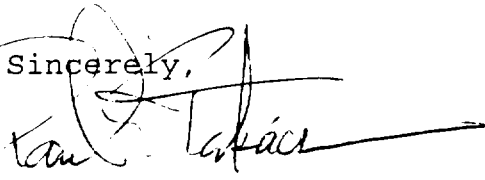
Ms. Sally Jansen  
USEPA-Region V, HSM-5J  
77 West Jackson Blvd.  
Chicago, Illinois 60604

Dear Sally:

As requested, please find enclosed a list of suggested specific questions that can be used in your 104(e) information request letters. I have also included a mailing list of 30 proposed PRPs that IEPA had previously contacted in regards to an earlier attempt to gain a non-NPL RI/FS settlement. Information IEPA has received over the past few years that relates to PRP information has also been included here.

Given the volume and content of the information IEPA is sending, I would strongly recommend that we have several meetings to discuss how this material will be represented in the information request letters. Please let me know if you have any immediate questions.

Sincerely,

  
Paul E. Takács, Project Manager  
Federal Sites Management Unit  
Division of Remediation Management  
Bureau of Land

Enclosures - Proposed 104(e) questions, 104(e) Mailing List,  
IEPA Potential PRP File Documents

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PROPOSED SPECIFIC QUESTIONS - Monsanto Chemical Company

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Process Questions

1. Provide a detailed listing of products were manufactured at both the Queeny and Krummrich plants for the time period between 1900 and 1982. Include a listing of products that were manufactured at a former unit of the Monsanto Krummrich plant (e.g. the "U.S Chemical Warfare Service Plant") now occupied by Ethyl Petroleum Additives, Inc.
2. Concerning the above, please give a brief description of the manufacturing processes for each major group of chemicals that were produced at these two plants during the time period. Also state what raw chemical products were received (e.g. benzene, chlorine, acids, etc.) at each of the plants and the additives and catalysts that were used to produce finished products.
3. The Krummrich plant evidently began operations at its present location in the early 1900s. Is there any information in existence that relates to the processes that were used at the Commercial Acid Works or the Indianahoma Oil Refinery? Does any information exist concerning wastes that were generated at these facilities?

Waste Types Produced

1. What specific types of organic and inorganic chemical wastes were generated from the above-mentioned production lines? Were off-specification products treated as wastes? Are there any figures in existence that relate to any volume or characteristic of wastes generated at these plants during the relevant time period?
2. As both plants have evolved over the years, how has the disposal of obsolete process equipment been handled?
3. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled? Were these materials commingled with waste products before disposal?

Disposal Procedures

1. Were all waste materials generated at the Queeny and Krummrich plants disposed of on plant property? Were disposal activities carried out by Monsanto employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.

2. Based on what information is known about products that were manufactured at both plants, many of the Sauget Area 1 sites appear to contain the types of wastes that could have been generated from manufacturing processes at both plants (mainly at Krummrich). These wastes types include chlorobenzenes, chlorophenols, chloroanilines, nitrophenols, nitroanilines and PCBs - all of which have been found at a landfill (River's Edge Landfill/Site R/Sauget Toxic) Monsanto owned and operated. Title information prepared by Monsanto has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I, where these waste types have been found. Had Monsanto ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Monsanto generated at either the Queeny or Krummrich plants during the period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Monsanto ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the period of Leo Sauget's and Paul Sauget's ownership of Sites G, H, and I? Have any Monsanto employees, directly or indirectly, coordinated any chemical waste disposal activities on any Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites? Also, do any of these questions pertain to the U.S. Chemical Warfare plant?

3. Contaminants found at Site L appear to be similar to those found at Sites G, H and I. Has Monsanto ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of chemical waste materials or off-specification products? Is Monsanto aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling Monsanto chemicals, chemical wastes or off-specification products that has used any services of Harold Waggoner or Waggoner & Company?

4. Contaminants found in sediments of all segments of Dead Creek appear to be similar to those found at Sites G, H, I and L. How were process wastewater and sanitary discharges generated at the Krummrich plant handled prior to the Krummrich plant hooking up to the Village of Monsanto's sewer system and when did the Krummrich plant hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Monsanto (and other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes or off-specification products into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Is Monsanto aware of any discharges to Dead Creek from its Krummrich plant after the Village of Monsanto's sewer system was constructed? Also, are any of these questions applicable to the U.S. Chemical Warfare Service plant?

5. How did Monsanto handle fly ash wastes generated from its power plant(s) at Queeny and Krummrich during the relevant time period? Also, does Monsanto have any knowledge that these materials could have been used for cover material at Sites G, H, I and L?

6. Concerning the "Notification of Hazardous Waste Site" form which was completed by the plant managers of the Queeny and Krummrich plants, Monsanto admits to have disposed of drums in a landfill along Falling Springs Road. The dates of waste handling appear to coincide with the time period that Site I and H were active. Does Monsanto have information that would indicate that these forms were written for Site I or Site H?

PROPOSED SPECIFIC QUESTIONS - Cerro Copper Products Company

**CONFIDENTIAL**

Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at Queeny and Mississippi Avenue in Sauget, Illinois now owned by Cerro Copper Products Company (hereinafter, "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing and recycling processes for the products that were manufactured at the facility during the time period. State what raw materials (e.g. scrap copper, copper wire, copper solutions, etc.) were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.
3. Does Cerro have knowledge that Cerro or any of its predecessors (e.g. Cerro DiPasco, Lewin Metals, etc.) accepted transformers at this facility for the purposes of recycling or recovering copper from the copper cores? If so, how were waste oils from the transformers handled?

Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production/recycling lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Cerro Copper or its predecessors ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Cerro or its

predecessors generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Cerro Copper or its predecessors ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of Cerro Copper or its predecessors, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Cerro Copper or its predecessors ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? Is Cerro Copper aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by Cerro or its predecessors using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Cerro Copper's predecessors (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. How did Cerro Copper and its predecessors handle solid wastes generated from its furnaces at the facility during the relevant time period? Also, does Cerro have any knowledge that these materials generated by Cerro or its predecessors could have been used for cover material at Sites G, H, I and L?

PROPOSED SPECIFIC QUESTIONS - Big River Zinc Corporation

Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at Route 3 and Monsanto Avenue in Sauget, Illinois now owned by Big River Zinc Corporation (hereinafter "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing and recycling processes for the products that were manufactured at the facility during the time period. State what raw materials were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Big River Zinc or its predecessors ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Big River Zinc or its predecessors generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Big River Zinc or its predecessors ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of

Big River Zinc or its predecessors, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Big River Zinc or its predecessors ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? Is Big River Zinc aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by Big River Zinc or its predecessors using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Big River Zinc's predecessors (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. How did Big River Zinc and its predecessors handle solid wastes generated at this facility during the relevant time period?



PROPOSED SPECIFIC QUESTIONS - Sterling Steel Foundry, Inc.

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Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at 2300 Monsanto Avenue in Sauget, Illinois now owned by Sterling Steel Foundry, Inc. (hereinafter "facility") for the time period between 1900 and 1982.

2. Concerning the above, please give a detailed description of the manufacturing and recycling processes for the products that were manufactured at the facility during the time period. State what raw materials (e.g. scrap iron, etc.) were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?

2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.

2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Sterling Steel Foundry or its predecessors ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Sterling Steel Foundry or its predecessors generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Sterling Steel Foundry or its predecessors ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned

these sites? Have any employees of Sterling Steel Foundry or its predecessors, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Sterling Steel Foundry or its predecessors ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? Is Sterling Steel Foundry aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by Sterling Steel Foundry or its predecessors using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Sterling Steel Foundry's predecessors (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. How did Sterling Steel Foundry and its predecessors handle solid wastes/foundry sands generated from its furnaces at the facility during the relevant time period? Also, does Sterling Steel Foundry have any knowledge that these materials generated by Sterling Steel Foundry or its predecessors could have been used for cover material at Sites G, H, I and L?

PROPOSED SPECIFIC QUESTIONS - Ethyl Petroleum Additives, Inc.

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Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at 501 Monsanto Avenue in Sauget, Illinois now owned by Ethyl Petroleum Additives, Inc. (hereinafter "facility") for the time period between 1900 and 1982. Please include information about the products that Edwin Cooper, Inc., Monsanto Chemical Company and the U.S. Chemical Warfare Service produced at this facility.
2. Concerning the above, please give a detailed description of the manufacturing and recycling processes for the products that were manufactured at the facility during the time period. State what raw materials were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Ethyl Petroleum Additives or its predecessors ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Ethyl Petroleum Additives or its predecessors generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Ethyl Petroleum Additives or

its predecessors ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of Ethyl Petroleum Additives or its predecessors, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Ethyl Petroleum Additives or its predecessors ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? Is Ethyl Petroleum Additives aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by Ethyl Petroleum Additives or its predecessors using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Ethyl Petroleum Additives's predecessors (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. How did Ethyl Petroleum Additives and its predecessors handle solid wastes generated at this facility during the relevant time period?

## PROPOSED SPECIFIC QUESTIONS - Midwest Rubber Reclaiming Division

### Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at 3101 Mississippi Avenue in Sauget, Illinois now owned by the Midwest Rubber Reclaiming Division of Empire Chemical, Inc. (hereinafter "facility") for the time period between 1900 and 1982.

2. Concerning the above, please give a detailed description of the manufacturing and treatment processes for the products that were manufactured at the facility during the time period. State what raw materials were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

### Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?

2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

### Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.

2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had the Midwest Rubber Reclaiming Division's predecessors ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials the Midwest Rubber Reclaiming Division's predecessors generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has the Midwest Rubber Reclaiming Division's predecessors ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the

relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of the Midwest Rubber Reclaiming Division or its predecessors, directly or indirectly, coordinated any waste disposal activities on Leo Sauget and Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has the Midwest Rubber Reclaiming Division's predecessors ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? Is the Midwest Rubber Reclaiming Division aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by the Midwest Rubber Reclaiming Division's predecessors using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for the Midwest Rubber Reclaiming Division's predecessors (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. The Illinois Environmental Protection Agency (IEPA) had documented that the predecessors of the Midwest Rubber Reclaiming Division maintained an 18 inch overflow line (outfall). This outfall originated at the facility and terminated at Dead Creek, just south of Queeny Avenue. In addition to contaminants such as naphthalene and other toxic organics which have been found in the segment of Dead Creek that is bounded by Queeny Avenue and Judith Lane, a significant portion of the creek sediments have been subsequently "rubberized", downstream of the outfall. Does the Midwest Rubber Reclaiming Division have any information on the time period which this outfall was operated? Is there any information on what manufacturing/wastewater processes were associated with discharges from the facility? Has this outfall ever been used by the Midwest Rubber Reclaiming Division? If so, what type of liquids were discharged?

6. How did the Midwest Rubber Reclaiming Division's predecessors handle solid wastes generated at this facility during the relevant time period?

## PROPOSED SPECIFIC QUESTIONS - Ruan Transport Corporation

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### Process Questions

1. Provide a detailed description of Ruan Transport Corporation's, and the Waggoner & Company's operations at the facility located at Queeny and Falling Springs Avenue in Sauget, Illinois (hereinafter "facility") for the time period between 1900 and 1982. Specifically state if Ruan Transport has any information relating to the practices of the Waggoner & Company operation which ran a hazardous waste hauling/truck cleaning business at the property now owned by Ruan Transport. Did Ruan Transport operate a similar business with the former Waggoner & Company facility? Does Ruan Transport have any information that would indicate that other waste haulers, truck washing operations or any business operated at, leased property from, or had made arrangements with Ruan Transport or Waggoner & Company for the purposes of discharging waste contaminants or products into Dead Creek or lagoons (Site L) adjacent to Dead Creek?

### Waste Types Produced

1. What specific types of organic or inorganic wastes/products were accepted at the facility during the relevant time period? Does Ruan Transport have documentation that relate to volumes or characteristics of organic or inorganic wastes/products accepted by either Ruan Transport or Waggoner & Company at the facility during the time period?

### Disposal Procedures

1. Were all waste materials and products accepted at the facility by Ruan Transport or Waggoner & Company disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.

2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Ruan Transport, or Waggoner & Company ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials or products Ruan Transport and Waggoner & Company accepted at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Ruan Transport or Waggoner & Company ever

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secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of Ruan Transport, or Waggoner & Company, directly or indirectly, coordinated any waste or product disposal activities on Leo Sauget and Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Ruan Transport ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials or products accepted at the facility prior to Ruan Transport's purchase of the facility?

4. Prior to the construction of the Site L lagoons, please give an approximate timeframe of Waggoner & Company's discharges into Dead Creek. Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Site L lagoons by Waggoner & Company? Were there any sanitary wastewaters discharged to Dead Creek after the construction of the Site L lagoons by Waggoner & Company?

5. Does Ruan Transport have in its possession, any records that relate to businesses that utilized the services of or transacted with Waggoner & Company? Are there any records that would indicate that the Monsanto Company sent tanker trucks to Waggoner & Company for the purposes of cleaning out the tanks? Are there any records that would indicate that other trucking firms doing business with Monsanto also used the services of Waggoner & Company?

6. How did Ruan Transport and Waggoner & Company handle solid wastes generated or accepted at this facility during the relevant time period? Did Ruan Transport or Waggoner & Company accept any cover materials (e.g. fly ash, cinders, etc.) for the Site L lagoons from Paul Sauget or Sauget & Company?



## PROPOSED SPECIFIC QUESTIONS - Rogers Cartage Company

**CONFIDENTIAL**

### Process Questions

1. Provide a detailed description of the Rogers Cartage Company's operations at the facility located at Falling Springs Avenue and Nickel Street Sauget, Illinois (hereinafter "facility") for the time period between 1900 and 1982. Does Rogers Cartage have any information relating to the practices of the Waggoner & Company operation which ran a hazardous waste hauling/truck cleaning business off of Queeny Road in Sauget. Has Rogers Cartage ever coordinated with or transacted with, the former Waggoner & Company or Ruan Transport in relation to the Waggoner & Company operation?

### Waste Types Produced

1. What specific types of organic or inorganic wastes or products were accepted at the facility during the relevant time period? Does Rogers Cartage have documentation that relate to volumes or characteristics of organic or inorganic wastes or products accepted by Rogers Cartage at the facility during the time period?

### Disposal Procedures

1. Were all waste materials or products accepted by Rogers Cartage at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.

2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Rogers Cartage ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials or products Rogers Cartage accepted at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Rogers Cartage ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of Rogers Cartage, directly or indirectly, coordinated any waste or product disposal activities on Leo Sauget and Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Concerning the portions of Site H and Site I that were under ownership of Rogers Cartage, please indicate if Rogers Cartage made any arrangements for the disposed of liquid or solid chemical waste materials or products accepted at the facility. Also, does Rogers Cartage have information relative to any waste or product disposal activities that had occurred on these properties prior to the purchase of them by Rogers Cartage?
4. Has it ever been a practice at Rogers Cartage to dispose of any wastes or products accepted at this facility into Dead Creek?
5. How did Rogers Cartage handle solid (including hazardous) wastes generated at this facility during the relevant time period?

PROPOSED SPECIFIC QUESTIONS - Kerr-McGee Corporation

Process Questions

1. Provide a detailed listing of products were manufactured at the former Moss-American Tie Plant in Sauget, Illinois (hereinafter, "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a brief description of the manufacturing processes that were used at this plant during the time period. Also state what raw chemical products were received (e.g. coal tars, creosote, PCP, etc.) at the plant and the additives that might have been used to produce finished products.

Waste Types Produced

1. What specific types of chemical wastes were generated from the above-mentioned production processes? Were off specification products treated as wastes? Are there any figures in existence that relate to any volume or characteristics of wastes generated at the facility during the relevant time period?
2. As the facility had evolved over the years, how was the disposal of obsolete process equipment handled?
3. How was contaminated soil handled? Were these materials commingled with waste products before disposal?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by Moss-American employees, Kerr-McGee employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Based on what information is known about the facility, many of the Sauget Area 1 sites appear to contain the types of wastes that could have been generated from the production processes at the facility. These wastes types include PNAs and PCP - all of which have been found at the facility Moss-American and Kerr-McGee owned and operated. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I, where these waste types have been found. Had Moss-American or Kerr-McGee ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical

waste materials Moss-American or Kerr-McGee generated at the facility during the period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Moss-American or Kerr-McGee ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the period of Leo Sauget's and Paul Sauget's ownership of Sites G, H, and I? Have any Moss-American or Kerr-McGee employees, directly or indirectly, coordinated any chemical waste disposal activities on any Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Contaminants found at Site L appear to be similar to those found at Sites G, H and I. Has Moss-American or Kerr-McGee ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of chemical waste materials or off-specification products? Is Kerr McGee aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling Moss American or Kerr-McGee chemical wastes or off-specification products that has used any services of Harold Waggoner or Waggoner & Company?

4. Contaminants found in sediments of certain segments of Dead Creek appear to be similar to those found at Sites G, H, I and L. How were process wastewater and sanitary discharges generated at the Moss-American facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the Moss-American facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Moss-American (and other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes or off-specification products into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Is Kerr-McGee aware of any discharges to Dead Creek from the facility after the Village of Monsanto's sewer system was constructed?

## PROPOSED SPECIFIC QUESTIONS - Mobil Oil Corporation

**CONFIDENTIAL**

### Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at 2000 South Twentieth Street in Sauget, Illinois now owned by the Mobil Oil Corporation (hereinafter, "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing processes for the products that were manufactured at the facility during the time period. State what raw materials (e.g. crude oil, kerosene, gasoline, waste oil, etc.) were received at the facility, the chemical additives (both organic and inorganic) and catalysts that were used to produce finished products.
3. Does Mobil Oil have knowledge that Mobil Oil or any of its predecessors (e.g. Lubrite Refining, Socony Oil, etc.) accepted waste oils from any business or individual for the purposes of recycling or refining?

### Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

### Disposal Procedures

1. Were all waste materials and off-specification products generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Mobil Oil or its predecessors ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials or off-

specification products Mobil Oil or its predecessors generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Mobil Oil or its predecessors ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of Mobil Oil or its predecessors, directly or indirectly, coordinated any waste or off-specification product disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Mobil Oil or its predecessors ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials or off-specification products generated at the facility? Is Mobil Oil aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes or off-specification products generated by Mobil Oil or its predecessors using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Mobil Oil's predecessors (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes or off-specification products into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. How did Mobil Oil and its predecessors handle solid wastes generated at the facility during the relevant time period?

## PROPOSED SPECIFIC QUESTIONS - Richard M. Cohen

### Process Questions

1. Provide a detailed listing of products that were manufactured under your direction at the facility located at 3101 Mississippi Avenue in Sauget, Illinois formerly known as the Midwest Rubber Reclaiming Company (hereinafter "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing and treatment processes for the products that were manufactured at the facility during the time period. State what raw materials were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

### Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

### Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had the Midwest Rubber Reclaiming Company ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials the Midwest Rubber Reclaiming Company generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has the Midwest Rubber Reclaiming Company ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I

when Leo Sauget and Paul Sauget owned these sites? Have any employees of the Midwest Rubber Reclaiming Company, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has the Midwest Rubber Reclaiming Company ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? As chairman of the former Midwest Rubber Reclaiming Company, are you aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by the Midwest Rubber Reclaiming Company using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for the Midwest Rubber Reclaiming Company (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. The Illinois Environmental Protection Agency (IEPA) had documented that the Midwest Rubber Reclaiming Company maintained an 18 inch overflow line (outfall). This outfall originated at the facility and terminated at Dead Creek, just south of Queeny Avenue. In addition to contaminants such as naphthalene and other toxic organics which have been found in the segment of Dead Creek that is bounded by Queeny Avenue and Judith Lane, a significant portion of the creek sediments have been subsequently "rubberized", downstream of the outfall. As chairman of the former Midwest Rubber Reclaiming Company, do you have any information on the time period which this outfall was operated? Is there any information on what manufacturing/wastewater processes were associated with discharges from the facility?

6. How did the Midwest Rubber Reclaiming Company handle solid wastes generated at this facility during the relevant time period?



PROPOSED SPECIFIC QUESTIONS - Stanley Kreitman

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Process Questions

1. Provide a detailed listing of products that were manufactured under your direction at the facility located at 3101 Mississippi Avenue in Sauget, Illinois formerly known as the Midwest Rubber Reclaiming Company (hereinafter "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing and treatment processes for the products that were manufactured at the facility during the time period. State what raw materials were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had the Midwest Rubber Reclaiming Company ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials the Midwest Rubber Reclaiming Company generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has the Midwest Rubber Reclaiming Company ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I

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when Leo Sauget and Paul Sauget owned these sites? Have any employees of the Midwest Rubber Reclaiming Company, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has the Midwest Rubber Reclaiming Company ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? As vice chairman of the former Midwest Rubber Reclaiming Company, are you aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by the Midwest Rubber Reclaiming Company using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for the Midwest Rubber Reclaiming Company (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. The Illinois Environmental Protection Agency (IEPA) had documented that the Midwest Rubber Reclaiming Company maintained an 18 inch overflow line (outfall). This outfall originated at the facility and terminated at Dead Creek, just south of Queeny Avenue. In addition to contaminants such as naphthalene and other toxic organics which have been found in the segment of Dead Creek that is bounded by Queeny Avenue and Judith Lane, a significant portion of the creek sediments have been subsequently "rubberized", downstream of the outfall. As vice chairman of the former Midwest Rubber Reclaiming Company, do you have any information on the time period which this outfall was operated? Is there any information on what manufacturing/wastewater processes were associated with discharges from the facility?

6. How did the Midwest Rubber Reclaiming Company handle solid wastes generated at this facility during the relevant time period?

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PROPOSED SPECIFIC QUESTIONS - Morris Weissman

Process Questions

1. Provide a detailed listing of products that were manufactured under your direction at the facility located at 3101 Mississippi Avenue in Sauget, Illinois formerly known as the Midwest Rubber Reclaiming Company (hereinafter "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing and treatment processes for the products that were manufactured at the facility during the time period. State what raw materials were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had the Midwest Rubber Reclaiming Company ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials the Midwest Rubber Reclaiming Company generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has the Midwest Rubber Reclaiming Company ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I

when Leo Sauget and Paul Sauget owned these sites? Have any employees of the Midwest Rubber Reclaiming Company, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has the Midwest Rubber Reclaiming Company ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? As president of the former Midwest Rubber Reclaiming Company, are you aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by the Midwest Rubber Reclaiming Company using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for the Midwest Rubber Reclaiming Company (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. The Illinois Environmental Protection Agency (IEPA) had documented that the Midwest Rubber Reclaiming Company maintained an 18 inch overflow line (outfall). This outfall originated at the facility and terminated at Dead Creek, just south of Queeny Avenue. In addition to contaminants such as naphthalene and other toxic organics which have been found in the segment of Dead Creek that is bounded by Queeny Avenue and Judith Lane, a significant portion of the creek sediments have been subsequently "rubberized", downstream of the outfall. As president of the former Midwest Rubber Reclaiming Company, do you have any information on the time period which this outfall was operated? Is there any information on what manufacturing/wastewater processes were associated with discharges from the facility?

6. How did the Midwest Rubber Reclaiming Company handle solid wastes generated at this facility during the relevant time period?

**PROPOSED SPECIFIC QUESTIONS - William J. Shive**

Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at 2300 Monsanto Avenue in Sauget, Illinois formerly known as the Sterling Steel Castings Corporation (hereinafter "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing and recycling processes for the products that were manufactured at the facility during the time period. State what raw materials (e.g. scrap iron, etc.) were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Sterling Steel Casting ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Sterling Casting generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Sterling Steel Casting ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of Sterling Steel Casting, directly or

indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Sterling Steel Casting ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? As president of the former Sterling Steel Casting Corporation, are you aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by Sterling Steel Casting using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Sterling Steel Casting (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. How did Sterling Steel Casting handle solid wastes/foundry sands generated from its furnaces at the facility during the relevant time period? Also, as president of the former Sterling Steel Casting Corporation, do you have any knowledge that these materials generated by Sterling Steel Casting could have been used for cover material at Sites G, H, I and L?

PROPOSED SPECIFIC QUESTIONS - Village of Sauget

~~CONFIDENTIAL~~

1. Provide a detailed listing of all business establishments, both industrial and commercial, whose business addresses were within the boundaries of what is presently known as the Village of Sauget for the time period between 1900 and 1982. Also include approximate dates which these businesses operated.
2. Concerning the above, please provide a description of the nature of services that these businesses offered during the time period.
3. Provide a detailed listing of all services that both the Village of Monsanto and the Village of Sauget (hereinafter, "Village") provided to the above-mentioned industrial establishments during the time period.
4. What specific types of organic or inorganic wastes were generated from the industrial establishments during the relevant time period? Did the Village keep records of or in any way monitor the quantities of chemical waste (organic and inorganic) materials that were generated within the Village during the time period? Was the Village in any way familiar with the types of chemical wastes that were generated in the Village?
5. Were any chemical waste materials generated at any of these industries disposed of on any property owned by the Village? If so, were these disposal activities performed with the Village's consent? Were any records kept that would indicate employees of the Village coordinated chemical waste disposal activities with any of the above-mentioned industries? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
6. Title information provided by the Monsanto Company has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Site G, Site H and Site I. Were the chemical waste disposal services of Leo Sauget, or his company later named "Industrial Salvage & Disposal, Inc." performed as actions that were sanctioned by the Village during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Were the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites sanctioned by the Village?
7. How were process wastewater and sanitary discharges generated at industries located within Village boundaries handled prior to the construction of the Village of Monsanto's sewer system and when was this system constructed? Prior to the construction of the Village

of Monsanto's sewer system, was it common practice for industries within the Village boundaries to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Have any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

8. In an impending lawsuit of Cerro Copper Products vs. Monsanto Chemical Company, Cerro alleges that periodic discharges from the Village sewer system into Dead Creek occurred at the northern portion of Dead Creek Segment A. Cerro also alleges that at least Dead Creek Segment A was used as a retention basin for the sewer system under certain conditions. Under what conditions did these discharges occur within the relevant time period? Since the natural drainage of Dead Creek was from north to south, does the Village know that this alleged "retention basin" was constructed so that the flow direction would be opposite (e.g. so that wastewaters would gravity flow back into the Village sewer system)? Did the Village alter the flow of Dead Creek Segment A in any way so that wastewaters generated by Village industries would gravity flow back into the Village sewer system? Did the Village take measures to keep this retention basin clear of silt? Does the Village have knowledge that this segment of Dead Creek was ever dredged? If so, was the Village involved in these actions? If so, what is the location of this dredged material and how was it disposed of?

9. Concerning the Harold Waggoner operation (now comprising Site L) that operated in the Village, does the Village of Sauget have any information about clients that did business with Harold Waggoner or Waggoner & Company?

10. Were any Village permits granted for the initial excavation of the gravel pits that now comprise Site G, Site H, and Site I? Does the Village have any information as to when these excavations were completed? Has the Village been involved in the practice of covering these sites for the purposes of making property improvements?

11. A newspaper article written in the early 1980s indicated that employees of the Village of Cahokia had involvement in the Sauget Area 1 Sites when chemical waste disposal activities were ongoing. This article mentions employees of the Cahokia Fire Department who were sent to assist firefighters from the Village of Monsanto to put out chemical fires at these landfills. Does the Village have any information on Village employees (e.g. from the fire or police departments) that have had involvement with or have knowledge of chemical waste disposal activities at the Sauget Area 1 Sites?

12. Does the Village have any information regarding Village board members or longtime Village residents that may have knowledge of waste disposal activities at the Sauget Area 1 Sites?

13. Does the Village have any information concerning blockages of Dead Creek at Judith Lane in Cahokia and Queeny Avenue in Sauget?



PROPOSED SPECIFIC QUESTIONS - Paul Sauget

CONFIDENTIAL

1. Title information provided by the Monsanto Company has indicated that you and Leo Sauget were the property owners of record during the periods of waste disposal at Site G, Site H, and Site I. As secretary of his chemical waste disposal service (later named "Industrial Salvage & Disposal, Inc."), do you have any knowledge regarding the nature and volumes of chemical wastes that were disposed of at these sites? Did you, Leo Sauget or Industrial Salvage & Disposal, Inc. haul chemical waste materials, obsolete process equipment or off-specification products generated at the Monsanto Krummrich or Monsanto Queeny plants to Site G, Site H or Site I? Did you, Leo Sauget or Industrial Salvage & Disposal, Inc. accept solid waste materials (such as fly ash and cinders) from any industry in what was known as the Village of Monsanto or the Village of Sauget (hereinafter, "Village") for the purposes of disposal or cover at Site G, Site H, and Site I? Were any of these actions sanctioned by the Village so as to make property improvements?

2. As secretary of Industrial Salvage & Disposal, Inc., please state the date which this business was incorporated. Did any officers or employees of this business conduct any of the above-mentioned waste disposal activities prior to the date that Industrial Salvage & Disposal was incorporated? If so, were business transactions performed by any of these officers on a contractual basis with local industries, namely Monsanto? Were any of these activities coordinated with employees of local industries with which these services were performed for? Were any of these activities coordinated with employees of the Village? Were any of these activities carried out with the knowledge of the Village board members?

3. Are any of the above questions applicable to you in your capacity as president of Sauget & Company?

PROPOSED SPECIFIC QUESTIONS - Harold G. Baker, Jr.

**CONFIDENTIAL**

1. Title information provided by the Monsanto Company has indicated that Leo Sauget and Paul Sauget were the property owners of record during the periods of waste disposal at Site G, Site H, and Site I. Do you have any knowledge regarding the nature and volumes of chemical wastes that were disposed of at these sites? Did Paul Sauget, Leo Sauget or Leo Sauget's company, Industrial Salvage & Disposal, Inc. haul chemical waste materials, obsolete process equipment and off-specification products generated from the Monsanto Krummrich or Monsanto Queeny plants to Site G, Site H or Site I? Did Paul Sauget, Leo Sauget or Industrial Salvage & Disposal, Inc. accept solid waste materials (such as fly ash and cinders) from any industry in what was known as the Village of Monsanto or the Village of Sauget (hereinafter, "Village") for the purposes of disposal or cover at Site G, Site H, and Site I? As attorney of the Village, are you aware that any of these actions were sanctioned by the Village so as to make property improvements?

2. Are any of the above questions applicable to you in your capacity as secretary and registered agent of Sauget & Company, formerly known as Industrial Salvage & Disposal?

PROPOSED SPECIFIC QUESTIONS - Village of Cahokia

CONFIDENTIAL

1. A newspaper article written in the early 1980s indicated that employees of the Village of Cahokia (hereinafter, "Village") had involvement in the Sauget Area 1 Sites when chemical waste disposal activities were ongoing. This article mentions employees of the Cahokia Fire Department who were sent to assist firefighters from what was known as the Village of Monsanto to put out chemical fires at these landfills. Does the Village have the names of these individuals? Does the Village have any information on other Village employees (e.g. from the health, police, public works departments) that have had involvement with or knowledge of chemical waste disposal activities at the Sauget Area 1 Sites?
2. Does the Village have any information regarding city council members or longtime Village residents that may have knowledge of waste disposal activities at the Sauget Area 1 Sites?
3. Does the Village have any information concerning the blockages of Dead Creek at Judith Lane in Cahokia and Queeny Avenue in Sauget? Were these actions performed by the Cahokia Health Department and Cahokia Department of Public Works or were they performed by the St. Clair County Highway department?
4. Is the Village aware of any chemical discharges or chemical waste disposal activities occurring south of Judith Lane? Does the Village have any information relating to waste disposal activities at the gravel pit (Site M) located at the end of Walnut Street? Does the Village have any information regarding the H. H. Hall Construction Company operating a waste disposal pit (Site N) adjacent to Dead Creek?

## PROPOSED SPECIFIC QUESTIONS - Amax Zinc Corporation

**CONFIDENTIAL**

### Process Questions

1. Provide a detailed listing of products that were manufactured at the facility located at Route 3 and Monsanto Avenue in Sauget, Illinois now owned by Big River Zinc Corporation (hereinafter "facility") for the time period between 1900 and 1982.
2. Concerning the above, please give a detailed description of the manufacturing and recycling processes for the products that were manufactured at the facility during the time period. State what raw materials were received at the facility and chemical additives (both organic and inorganic) that were used to produce finished products.

### Waste Types Produced

1. What specific types of organic or inorganic wastes were generated from the production lines at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
2. How was contaminated soil, contaminated clothing/protective gear, and laboratory wastes handled?

### Disposal Procedures

1. Were all waste materials generated at the facility disposed of on plant property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
2. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the property owners of record during the periods of waste disposal at Sites G, H and I. Had Amax Zinc or its predecessors ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Amax Zinc or its predecessors generated at this facility during the time period of Leo Sauget's and Paul Sauget's ownership of Sites G, H and I? Has Amax Zinc or its predecessors ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Sites G, H, and I when Leo Sauget and Paul Sauget owned these sites? Have any employees of Amax Zinc or

its predecessors, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?

3. Has Amax Zinc or its predecessors ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal of liquid chemical waste materials generated at the facility? Is Amax Zinc aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by Amax Zinc or its predecessors using any services of Harold Waggoner or Waggoner & Company?

4. How were process wastewater and sanitary discharges generated at this facility handled prior to the facility hooking up to the Village of Monsanto's sewer system and when did the facility hook up to this system? Prior to the construction of the Village of Monsanto's sewer system, was it common practice for Amax Zinc's predecessors (or other industries in the Village of Monsanto) to discharge these waters directly into Dead Creek? Was it common practice to discharge liquid chemical wastes into Dead Creek prior to the construction of the Village of Monsanto's sewer system? Were any sanitary or process wastewaters discharged to Dead Creek after the construction of the Village of Monsanto's sewer system?

5. How did Amax Zinc and its predecessors handle solid wastes generated at this facility during the relevant time period?

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**PROPOSED SPECIFIC QUESTIONS - Wiese Planning & Engineering, Inc.**

1. Provide a detailed listing of services provided at the facility located at 1200 Queeny Avenue in Sauget, Illinois now owned by Wiese Planning & Engineering (hereinafter "facility") for the time period between 1900 and 1982.
2. What specific types of organic or inorganic wastes (e.g. solvents, cleaners, etc) are generated at the facility during the relevant time period? Are there any figures in existence that relate to a volume or characteristic of organic or inorganic wastes generated at the facility during the time period?
3. Were all waste materials generated at the facility disposed of on facility property? Were disposal activities carried out by company employees or outside personnel? If the activities were carried out by non-employees, please state which party (or parties) carried out these activities.
4. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) was the main property owner of record during the periods of waste disposal at Site G. Had Wiese Planning & Engineering ever secured the services of Leo Sauget or his company later named "Industrial Salvage & Disposal, Inc." to process, accumulate, treat, remove, haul or dispose of any chemical waste materials Wiese Planning & Engineering generated at this facility during the time period of Leo Sauget's ownership of Site G? Has Wiese Planning & Engineering ever secured the services of Paul Sauget or Sauget & Company to perform the above activities during the relevant time period at Site G when Leo Sauget owned the site? Have any employees of Wiese Planning and Engineering, directly or indirectly, coordinated any waste disposal activities on Leo Sauget or Paul Sauget-owned properties comprising the Sauget Area 1 sites?
5. Regarding the parcels of property that were purchased from Leo Sauget, what information does Wiese Planning & Engineering have concerning the use of the property prior to the purchase? Is there any information concerning the use of the building Wiese Planning & Engineering now occupies prior to the purchase of the property? Was this building used for Leo Sauget's equipment storage prior to the purchase? If so, was any equipment or chemical waste materials left behind?
6. Is Wiese Planning & Engineering aware of any waste disposal that might have occurred at Site G during its ownership of property in Site G?
7. Has Wiese Planning & Engineering ever secured the services of Harold Waggoner or Waggoner & Company to arrange for the disposal

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of liquid chemical waste materials generated at the facility? Is Wiese Planning & Engineering aware of Leo Sauget, Paul Sauget, Industrial Waste Salvage Inc., Sauget & Company, or any trucking firm hauling liquid chemical wastes generated by Wiese Planning & Engineering using any services of Harold Waggoner or Waggoner & Company?

8. How has Wiese Planning & Engineering handled solid wastes generated at this facility during the relevant time period?

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**PROPOSED SPECIFIC QUESTIONS - Illinois State Trust Company**

1. Title information has indicated that Leo Sauget (the former mayor of the Village of Monsanto) and Paul Sauget were the main property owners of record during the periods of waste disposal at Site I. Portions of Site I were also held in trust by the Illinois State Trust Company. Please provide all information regarding the circumstances of the trust arrangement. Was Illinois State Trust aware that chemical waste disposal activities were occurring at Site I while it held the property in trust?